

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FILED UNDER SEAL

UNITED STATES OF AMERICA,) INDICTMENT CR10-181 ADM/AJB
)
Plaintiff,) (18 U.S.C. § 2))
) (21 U.S.C. § 841(a)(1))
v.) (21 U.S.C. § 841(b)(1)(B))
) (21 U.S.C. § 841(b)(1)(C))
1. ROY JOSEPH KEYES,) (21 U.S.C. § 846)
a/k/a "Wakoo," and)
)
2. AKO KALONJI DENNIS,)
a/k/a "K.O.,")
)
Defendants.)

THE UNITED STATES GRAND JURY CHARGES THAT:

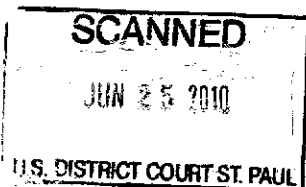
COUNT 1

(Conspiracy to Distribute Heroin and Oxycodone)

Beginning in or about 2004 and continuing through on or about the date of this indictment, in the State and District of Minnesota and elsewhere, the defendants,

ROY JOSEPH KEYES,
a/k/a "Wakoo," and
AKO KALONJI DENNIS,
a/k/a "K.O.,"

did unlawfully, knowingly and intentionally conspire with each other and with others, known and unknown to the grand jury, to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a controlled substance, and numerous tablets of Oxycontin, containing oxycodone, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 846.



JUN 23 2010
FILED
RICHARD B. SLETTER, CLERK
JUDGMENT ENTERED
DEPUTY CLERK'S OFFICE

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COUNT 2

(Possession With Intent to Distribute Heroin)

On or about February 15, 2008, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

(Distribution of Heroin)

On or about May 14, 2009, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

did unlawfully, knowingly and intentionally distribute 0.44 gram of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

(Distribution of Heroin)

On or about May 20, 2009, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

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did unlawfully, knowingly and intentionally distribute 0.35 gram of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

(Distribution of Heroin)

On or about June 11, 2009, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

being aided and abetted by another, did unlawfully, knowingly and intentionally distribute 0.67 gram of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6

(Distribution of Heroin)

On or about July 9, 2009, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

did unlawfully, knowingly and intentionally distribute 0.63 gram of a mixture and substance containing a detectable amount of heroin,

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a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 7

(Distribution of Heroin)

On or about July 23, 2009, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

did unlawfully, knowingly and intentionally distribute 0.46 gram of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8

(Distribution of Heroin)

On or about August 6, 2009, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

did unlawfully, knowingly and intentionally distribute 0.47 gram of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 9

(Distribution of Heroin)

On or about August 13, 2009, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

did unlawfully, knowingly and intentionally distribute 0.56 gram of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 10

(Distribution of Heroin)

On or about August 26, 2009, in the State and District of Minnesota, the defendant,

ROY JOSEPH KEYES,
a/k/a "Wakoo,"

being aided and abetted by another, did unlawfully, knowingly and intentionally distribute 0.95 gram of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 11

(Distribution of Heroin)

On or about December 19, 2009, in the State and District of Minnesota, the defendant,

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ROY JOSEPH KEYES,
a/k/a "Wakoo,"

did unlawfully, knowingly and intentionally distribute approximately 0.75 gram of a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON